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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

KAIQING YANG; SHOUZHONG DING, as  
executor to decedent estate of JIANHUA PAN,

Plaintiffs,

v.

WILLIAM WEIDNER; DAVID JACOBY;  
SAHARA INVESTMENTS, LLC; LAS  
VEGAS ECONOMIC IMPACT REGIONAL  
CENTER, LLC; EASTERN INVESTMENTS,  
LLC; BOFU, LLC; WEIDNER  
MANAGEMENT, LLC; JODI FONFA, as  
executrix to decedent estate of ANDREW S.  
FONFA; DOES 1 through 100, inclusive; ROE  
ENTITIES 1 through 100,

Defendants.

Case No. 2:20-cv-01518-KJD-DJA

**STIPULATION AND ORDER TO STAY  
DISCOVERY AND CONTINUE ALL  
DEADLINES INCLUDING RULE 26(f)  
CONFERENCE AND DEADLINE TO  
SUBMIT STIPULATED DISCOVERY  
PLAN AND SCHEDULING ORDER**

**(SECOND REQUEST)**

1 Pursuant to Rules 16(b) and 26(f) of the Federal Rules of Civil Procedure and Local  
2 Rules LR 6-1 and 26-1, the undersigned parties hereby stipulate and agree to continue the Rule  
3 26(f) Conference and the submission of the Stipulated Discovery Plan and Scheduling Order as  
4 set forth more fully below.

5 1. On May 21, 2021, counsel for Plaintiffs circulated an email seeking to schedule a  
6 Rule 26(f) conference in June 2021.

7 2. In response to the e-mail from Plaintiffs' counsel, counsel for Defendants  
8 requested Plaintiffs to agree to a stay of this matter, including a stay of all discovery, pending  
9 resolution of the *sub judice* Motions to Dismiss. (ECF Nos. 61-63, 66, 69, 72-74).

10 3. Counsel for Plaintiffs and Defendants had subsequent conversations concerning  
11 Defendants' intention to move for a stay pending resolution of the Motions to Dismiss and  
12 Plaintiffs' counsel's concern that other potential plaintiffs—i.e. the plaintiffs who previously  
13 brought claims against the Defendants in United States District Court District of Nevada Case  
14 No. 2:19-cv-00229 (the "Potential Plaintiffs")—may seek to be joined as plaintiffs in this action  
15 or may seek to bring a similar action based on the resolution of this action and may be adversely  
16 affected if a stay is instituted without a tolling of the statute of limitations.

17 4. Ultimately, counsel for all parties agreed to a temporary stay until the earlier of  
18 (a) ninety (90) days from Court approval of this stipulation, or (b) thirty (30) days after the Court  
19 issues orders either granting or denying all of the above-mentioned motions to dismiss so long as  
20 any claims remain pending after the issuance of said orders, and also preserving the rights of all  
21 Parties hereafter to seek or oppose a further stay.

22 5. This Court entered the Order based on the agreement of counsel (ECF No. 78),  
23 which is set to expire on October 12, 2021.

24 6. Beginning the week of September 13, 2021, counsel for the parties discussed  
25 whether they could reach agreement on an extension of the stay and Defendants' intention to  
26 move for a stay pending resolution of the Motions to Dismiss if counsel could not reach an  
27 agreement.

7. Based on the agreement of counsel, the Parties hereby stipulate and agree that:

- all discovery in this matter (including, without limitation, Initial Disclosures, the Rule 26(f) conference, and the Stipulated Discovery Plan and Scheduling Order) is stayed until thirty (30) days after the Court issues orders either granting or denying all of the above-mentioned motions to dismiss so long as any claims remain pending after the issuance of said orders;
- any Party may seek or oppose a further stay of discovery in this matter;
- subject to another agreement of the Parties or a motion by any of the Parties seeking a further stay, the Stipulated Discovery Plan and Scheduling Order shall be due thirty (30) days after the stay expires; and
- the statute of limitations is tolled with respect to the period of time that the stay of discovery is in effect with respect to any of the Potential Plaintiffs who hereafter seeks to be joined as a plaintiff in this action or who bring substantially similar claims after the resolution of this action.

IT IS SO AGREED AND STIPULATED.

Dated this 22nd day of September, 2021

Dated this 22nd day of September, 2021

/s/ Brody R. Wight

/s/ Oliver J. Pancheri

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Dated this 22nd day of September, 2021

Dated this 22nd day of September, 2021

/s/ Robert W. Hernquist

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*Attorneys for Defendant Las Vegas Economic  
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**IT IS SO ORDERED**

  
UNITED STATES MAGISTRATE JUDGE

DATED: September 23, 2021